

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

**HARTFORD FIRE INSURANCE
COMPANY and HARTFORD
CASUALTY INSURANCE COMPANY**

Plaintiffs,

v.

**INTERDIGITAL COMMUNICATIONS
CORPORATION and INTERDIGITAL
TECHNOLOGY CORPORATION**

Defendants.

JURY TRIAL DEMANDED

CIVIL ACTION NO. 06-422-JJF

NOTICE OF DEPOSITION

To: Arleigh P. Helfer, III, Esquire
Steven Mathes, Esquire
Hoyle, Fickler, Herschel & Mathes LLP
Suite 1500
One South Broad Street
Philadelphia, PA 19107-3418
*Counsel for InterDigital Communications
Corporation and InterDigital Technology
Corporation*

Richard L. Horwitz, Esquire
Jennifer C. Wasson, Esquire
Potter Anderson & Corroon LLP
Hercules Plaza, 6th Floor
1313 North Market Street
Wilmington, DE 19801
*Counsel for InterDigital
Communications Corporation and
InterDigital Technology Corporation*

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 30(b)(6), on Tuesday, October 9, 2007 at 9:00 a.m, at the law offices White and Williams LLP, 1800 One Liberty Place, Philadelphia, PA 19103, Plaintiffs, Hartford Fire Insurance Company and Hartford Casualty Insurance Company (collectively referred to herein as “Hartford”), will take the deposition in the above-captioned action of Defendants, InterDigital Communications Corporation and InterDigital Technology Corporation (collectively referred to herein as “InterDigital”), before an officer authorized by law to administer oaths, and such deposition will

continue from day-to-day thereafter until completed. Defendants shall designate one or more persons who consent to testify on their behalf about matters known or reasonably available to the Defendants concerning the topics set forth below. You are invited to attend and cross-examine the witness(es) if you so desire.

DEFINITIONS

Hartford refers to and incorporates herein as if set forth at length the definitions set forth in Hartford Fire Insurance Company and Hartford Casualty Insurance Company's April 2007 Interrogatories directed to InterDigital Communications Corporation and InterDigital Technology Corporation.

TOPICS FOR EXAMINATION

1. When and why InterDigital retained each of the law firms for which InterDigital seeks payment/reimbursement by Hartford, including but not necessarily limited to (a) Fulbright & Jaworski LLP, (b) WilmerHale LLP, (c) Finnegan, Henderson, Farabow, Garret & Dunner, LLP, (d) Volpe and Koenig P.C., (e) Potter Anderson & Corroon LLP, (f) Wilson Sonsini Goodrich & Rosati, and (g) any law firms identified in response to Interrogatory No. 1 in Hartford Fire Insurance Company And Hartford Casualty Insurance Company Second Set Of Interrogatories Directed To Defendants InterDigital Communications Corporation And InterDigital Technology Corporation.

2. The identity of the person at each of the law firms for which InterDigital seeks payment/reimbursement by Hartford, including but not necessarily limited to (a) Fulbright & Jaworski LLP, (b) WilmerHale LLP, (c) Finnegan, Henderson, Farabow, Garret & Dunner, LLP, (d) Volpe and Koenig P.C., (e) Potter Anderson & Corroon LLP, (f) Wilson Sonsini Goodrich &

Rosati, and (g) any law firms identified in response to Interrogatory No. 1 in Hartford Fire Insurance Company And Hartford Casualty Insurance Company Second Set Of Interrogatories Directed To Defendants InterDigital Communications Corporation And InterDigital Technology Corporation, responsible for taking a lead at that firm for its role in the *Nokia* action, as well as the identity of each attorney at these law firms who was approved to work on file and the rates at which such individuals were authorized to bill their time.

3. As relates to the *Nokia* action, the retention and/or termination, and the role played by work performed by each of the law firms for which InterDigital seeks payment/reimbursement by Hartford, including but not necessarily limited to (a) Fulbright & Jaworski LLP, (b) WilmerHale LLP, (c) Finnegan, Henderson, Farabow, Garret & Dunner, LLP, (d) Volpe and Koenig P.C., (e) Potter Anderson & Corroon LLP, (f) Wilson Sonsini Goodrich & Rosati, and (g) any law firms identified in response to Interrogatory No. 1 in Hartford Fire Insurance Company And Hartford Casualty Insurance Company Second Set Of Interrogatories Directed To Defendants InterDigital Communications Corporation And InterDigital Technology Corporation.

4. Any billing guidelines issued to, and/or agreed upon by any/each of the law firms for which InterDigital seeks payment/reimbursement by Hartford, including but not necessarily limited to (a) Fulbright & Jaworski LLP, (b) WilmerHale LLP, (c) Finnegan, Henderson, Farabow, Garret & Dunner, LLP, (d) Volpe and Koenig P.C., (e) Potter Anderson & Corroon LLP, (f) Wilson Sonsini Goodrich & Rosati, and (g) any law firms identified in response to Interrogatory No. 1 in Hartford Fire Insurance Company And Hartford Casualty Insurance Company Second Set Of Interrogatories Directed To Defendants InterDigital Communications Corporation And InterDigital Technology Corporation.

5. The fees and expenses charged by each of the law firms for which InterDigital seeks payment/reimbursement by Hartford, including but not necessarily limited to (a) Fulbright & Jaworski LLP, (b) WilmerHale LLP, (c) Finnegan, Henderson, Farabow, Garret & Dunner, LLP, (d) Volpe and Koenig P.C., (e) Potter Anderson & Corroon LLP, (f) Wilson Sonsini Goodrich & Rosati, and (g) any law firms identified in response to Interrogatory No. 1 in Hartford Fire Insurance Company And Hartford Casualty Insurance Company Second Set Of Interrogatories Directed To Defendants InterDigital Communications Corporation And InterDigital Technology Corporation, and any supporting documents and information for those fees and expenses.

6. Any lawsuits involving both (a) InterDigital and (b) any of the patents at issue in the *Nokia* action and the work performed by any of the following firms in any such lawsuit(s): (a) Fulbright & Jaworski LLP, (b) WilmerHale LLP, (c) Finnegan, Henderson, Farabow, Garret & Dunner, LLP, (d) Volpe and Koenig P.C., (e) Potter Anderson & Corroon LLP, (f) Wilson Sonsini Goodrich & Rosati, and (g) any law firms identified in response to Interrogatory No. 1 in Hartford Fire Insurance Company And Hartford Casualty Insurance Company Second Set Of Interrogatories Directed To Defendants InterDigital Communications Corporation And InterDigital Technology Corporation, and any supporting documents and information for those fees and expenses.

7. For any lawsuits involving InterDigital that were active and/or ongoing at any point in time since the commencement of the *Nokia* action, the identity of any law firm providing services to InterDigital in any other such litigation and, to the extent that any firm whose fees InterDigital is seeking in this lawsuit was involved in any other such lawsuit, the work and services provided by such firm and the means of ensuring that work on that other lawsuit is/was

not included in the invoices for the *Nokia* action for which InterDigital is seeking reimbursement.

8. The existence and location of, and InterDigital's efforts to search for and produce, documents requested by Hartford in its First and Second Requests for Production of Documents Directed to Defendants InterDigital Communications Corporation and InterDigital Technology Corporation.

Additionally, to the extent not previously produced by InterDigital in advance of the deposition, Hartford hereby requests, pursuant to Fed. R. Civ. P. Rule 30(b)(5) and Rule 34, that InterDigital produce at the deposition all documents requested in Hartford Fire Insurance Company and Hartford Casualty Insurance Company's Second Request For Production of Documents Directed to Defendants InterDigital Communications Corporation and InterDigital Technology Corporation.

WHITE AND WILLIAMS

Attorneys for Plaintiffs, Hartford Fire Insurance Company and Hartford Casualty Insurance Company

By: /s/ James S. Yoder

James S. Yoder, Esquire
White and Williams LLP
824 N. Market Street - Suite 902
Wilmington, DE 19899-0709
(302) 654-0424

and

Gale White, Esquire
Anthony L. Miscioscia, Esquire
White and Williams LLP
1800 One Liberty Place
Philadelphia, PA 19103-7395
Tel. No. (215) 864-6234/6356

CERTIFICATE OF SERVICE

I, James S. Yoder, Esquire, hereby certify that I have caused a true and correct copy of Hartford Fire Insurance Company and Hartford Casualty Insurance Company's notice of deposition directed to InterDigital Communications Corporation and InterDigital Technology Corporation's corporate designee as to certain designated topics to be served, via First Class Mail, postage prepaid, upon the following:

Arleigh P. Helfer, III, Esquire
Steven Mathes, Esquire
Hoyle, Fickler, Herschel & Mathes LLP
Suite 1500
One South Broad Street
Philadelphia, PA 19107-3418
*Counsel for InterDigital
Communications Corporation and
InterDigital Technology Corporation*

Richard L. Horwitz, Esquire
Jennifer C. Wasson, Esquire
Potter Anderson & Corroon LLP
Hercules Plaza, 6th Floor
1313 North Market Street
Wilmington, DE 19801
*Counsel for InterDigital Communications
Corporation and InterDigital Technology
Corporation*

WHITE AND WILLIAMS LLP

/s/ James S. Yoder
James S. Yoder

Date: September 12, 2007